

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) Cr. No. 04-10060-RCL
 v.)
)
 GEORGE SCHUSSEL,)
 Defendant.)

**DEFENDANT'S MEMORANDUM IN SUPPORT OF MOTION TO INSPECT AND
COPY PROBATION OFFICE RECORDS**

In response to the Court's direction to specify the materials that defendant seeks to discover, defendant submits the following specifications:

All statements by the witness or his/her agents that relate to (1) the substance of his/her direct testimony, (2) the issues raised in the instant case, (3) the witnesses' financial condition, (4) promises made to, or benefits expected by, the witnesses, and (5) Brady material.

It is defendant's purpose to discover all materials that may be used to impeach the witnesses in cross-examination or may lead to discovery of evidence useful to the defendant in the preparation of his defense.

By his attorneys,

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Dated: January 10, 2007

Certificate of Service

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/s/ Francis J. DiMento